



CENTER FOR MEDICARE

DATE: March 3, 2011

TO: All Current and Prospective Part D Organizations

FROM: Cynthia Tudor, Ph.D., Director
Medicare Drug Benefit and C & D Data Group

SUBJECT: Instructions for Requesting Formulary Consultant Access to the Health Plan Management System (HPMS)

Part D organizations may designate a “third-party” formulary consultant to submit formularies and formulary negative change requests in HPMS on their behalf. CMS will grant formulary consultants the appropriate level of HPMS access, provided the designee is employed by a subcontractor to a Part D organization for a delegated Part D function, such as a pharmacy benefit manager (PBM).

This memo provides instructions for requesting and obtaining access to HPMS as a formulary consultant. HPMS access for formulary consultant users will be limited to the submission of formularies and negative change requests.

Please note that these instructions do not apply to formulary staff directly employed by the Part D organization. These staff should follow the standard instructions for requesting access to HPMS.

Submitting a Request for a New HPMS User – Formulary Consultants

If the formulary consultant does **not** have access to HPMS, the user must follow these steps:

- Download the *Application for Access to CMS Computer Systems* form from <http://www.cms.hhs.gov/InformationSecurity/Downloads/EUAaccessform.pdf>.
- Complete the form as follows:
 - Section 1 – Check “New” as the type of request.
 - Section 2 – Check “Medicare Advantage / Medicare Advantage with Prescription Drug / Prescription Drug Plan / Cost Contracts – Using HPMS Only”.

- Section 3 – Enter the contract number(s) for which you will be submitting formularies.
- Section 4 – Check the first row beneath the "Default Non-CMS Employee" row (i.e., place a check in the Connect box of the third row). On the blank line beside your check mark, write "HPMS_P_CommUser".
- Section 5 – State briefly that you require HPMS access to act as a formulary consultant.
- Section 6 – Leave blank.
- Sign and date the Privacy Act Statement on page 3 of the form. Also enter your name and Social Security Number at the top of page 3. This step is critical to ensuring the successful processing of your request.

In addition to the *Application for Access to CMS Computer Systems* form, the formulary consultant **must provide an official letter from each Part D organization for which the consultant is under contract to submit a formulary via HPMS.** The letter must clearly indicate that the individual will be serving as a formulary consultant on behalf of the Part D organization and specify the contract number(s) for which HPMS access is required for this purpose. The letter must be provided on the Part D organization's official letterhead and signed by a senior official of the sponsoring organization. This letter must also have an original hardcopy signature.

NOTE: If a formulary consultant is contracted with multiple Part D organizations, only one CMS user access form is required, but **a letter must be provided from each organization for which the formulary consultant will be serving as an agent in HPMS.** At least one letter from a sponsoring organization must be submitted in order for a formulary consultant request to be processed.

CMS recommends the use of the following sample language in the official organization letter:

(Name of Organization) hereby requests that *(Name of Formulary Consultant)* with the firm of *(Name of Consulting Firm)* requires HPMS formulary consultant access to submit formulary information on our behalf. *(Name of Consultant)* requires access to the following contract number(s): *(list specific contract numbers)*.

This letter must also include a contact person, including title, phone number, and e-mail address, from the Part D organization to address questions regarding the request.

Submitting a Request for an Existing HPMS User – Formulary Consultants

If the formulary consultant **does** have access to HPMS, the user must follow these steps:

- Do NOT resubmit the user request form.
- Submit an official letter from each Part D organization for which you are under contract to submit a formulary via HPMS. All instructions noted above for this

requirement must be followed (see “Submitting a Request for a New HPMS User – Formulary Consultants”).

- In addition, the official letter(s) for an existing HPMS user **must** include the consultant’s CMS user ID and state that this user already has HPMS access.

Important Reminders for the *Application for Access to CMS Computer Systems Form*

Please be aware of the following important instructions when preparing a request for HPMS access:

- Include the contract number(s) for which you require formulary access in Section 3.
- Always provide a Social Security Number. CMS will **not** process a request without this piece of information.
- Complete the user request form in ink, not pencil.
- Submit the original hardcopy form with an original signature and date.
Photocopies and faxes are unacceptable.

Managing Formulary Consultant Access

Ultimately, it is the responsibility of the Part D organization to manage and maintain the set of users for whom you have requested HPMS access. This general principle applies to both plan staff and any consultants serving as agents of the Part D organization.

CMS provides organizations with reports in HPMS that can be used to manage user access to your contract number(s). To obtain access to the “plan user access” reports, Part D organizations must submit a request to hpms_access@cms.hhs.gov.

Part D organizations may request the removal of a user from accessing their data in HPMS at any time. These requests should be sent to hpms_access@cms.hhs.gov. Requests must contain the user ID and name of the individual to be removed from HPMS.

In the case of consultant users, it is important to remember that these individuals may serve multiple organizations. When requesting the removal of a formulary consultant, please ensure that you identify the individual as a consultant and request the removal of the individual’s access to **only** your specific contract numbers. Failure to provide this level of detail may result in the deletion of a formulary consultant’s CMS user ID rather than simply the consultant’s access to your contract number(s).

Organization Responsibility for Compliance with Part D Requirements

CMS considers a formulary consultant to be a subcontractor acting on behalf of each Part D organization. Consequently, CMS reminds organizations that, pursuant to 42 C.F.R.

§423.505(i)(1), they remain ultimately responsible for meeting the requirements of the Part D program. Therefore, to the extent that a formulary consultant's performance of a formulary-related task is not compliant with Part D program requirements, CMS will attribute that non-compliance to the organization that contracted with the formulary consultant to complete the task.

How to Submit HPMS Access Requests – Formulary Consultants

Submit the original (not a copy) user access form, when required, and the corresponding organization letter(s) via traceable carrier to:

Ms. Sara Silver
Re: Formulary Consultant Access
7500 Security Blvd.
Location: C4-18-13 / Mailstop: C4-18-13
Baltimore, MD 21244

To ensure sufficient time for processing, CMS strongly recommends the submission of these requests by **March 14, 2011**.

For questions regarding formulary consultant access to HPMS, please contact Sara Silver at either 410-786-3330 or Sara.Silver@cms.hhs.gov.

For questions regarding formulary submissions, please contact Brian Martin at either 410-786-1070 or Brian.Martin@cms.hhs.gov.

Thank you for your attention to this matter.